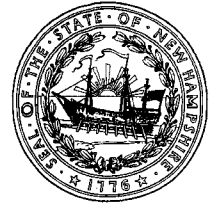




The State of New Hampshire  
**Department of Environmental Services**



Michael P. Nolin  
Commissioner

August 9, 2006

Robert Griggs  
Griggs Enterprises  
PO Box 1019  
Epsom, NH 03234

**LETTER OF DEFICIENCY# WSEB 06-078**  
CERTIFIED MAIL# 7099 3400 0003 6156 4753

Subject: East Kingston - Public Water System: Barton Mobile Home Park (EPA# 0702010)

Dear Mr. Griggs:

The records of the Department of Environmental Services (DES) show that the Barton MHP water system is classified as a public water system (PWS), as defined by RSA 485:1-a. A PWS is defined as any water system serving 15 or more services, or 25 or more people for 60 days or more a year. As the owner of a PWS, you are required to comply with the provisions of RSA 485 and NH Admin. Rule Env-Ws 300.

RSA 485:8, II prohibits the addition of a source to a public water system without approval by DES. On or about June 29, 2006, DES was informed that a dug well had been connected to the referenced water system. DES records indicate this dug well had not received new well siting approval as required by Env-Ws 378, *Site Selection of Small Production Wells for Community Water Systems*.

On June 30, 2006, DES sent you a letter which requested you to either disconnect the dug immediately or, if the well was needed in response to an emergency condition, to contact Diana Morgan, P.G., to pursue obtaining Interim Emergency Approval for the well. To date, DES has not been contacted to obtain Interim Emergency Approval for the dug well.

On July 19, 2006, DES staff conducted a site inspection of the Barton MHP water system accompanied by the certified operator of the system, Alec Bottomly. The dug well was confirmed to be operational and connected to the water system. The dug well was not equipped with a sealed and secure well cover that would prevent insects and other foreign matter from entering the well. In addition, the openings in the well cover for the electrical cables and water line were not sealed. Mr. Bottomly was unable to produce a copy of the Well Completion Report, could not identify the person who constructed the well, and did not know if the person who constructed the well was licensed to do so in NH.

During the above cited inspection, DES staff also noted that the construction of the dug well appeared to be what is commonly known as a "Six-Packed Well." This type of construction consists of a six-inch PVC casing installed within an excavated area filled with crushed stone, which is then covered with an impervious layer of clay and backfilled around the casing.

Because of several problems with this type of well construction, the NH Water Well Board has recommended that this type of design not be acceptable under We 602.07, *Standard Practice for the Construction of Shallow Wells in Unconsolidated Material by Excavation*.

A follow-up visit to the water system by DES staff on July 28, 2006, determined that the dug well was still connected to the system and operational.

The connection of an unapproved well to a public water system places the water system in violation of RSA 485:8, II and Env-Ws 378. DES believes the violation can be corrected by taking one of the two following numbered actions:

1. **Immediately** disconnect the dug well from the water system and document the disconnection, in writing, to DES within 10 days of the date of this letter;  
**or**
2. **Within 15 days of the date of this letter**, obtain Interim Emergency Approval from DES for the dug well. To obtain such approval the system must complete the following tasks:
  - a.) Submit the request for Interim Emergency Approval for the dug well in writing and document in detail how the decline in yield of Bedrock Well #1 (Source: 0702010-001) prevents the system from meeting water supply needs of existing customers. Include meter reading, if available, to document the decline in yield; and
  - b.) Hire a licensed dug well contractor and pump installer to upgrade the dug well construction to meet the requirements of We 602.07, *Standard Practice for the Construction of Shallow Wells in Unconsolidated Material by Excavation*, and We 700, *Standards for the Installation, Maintenance, Repair, or Replacement of Pumps*, or install a new dug well that meets the requirements of We 602, *New Well Construction*, and We 700; and
  - c.) Submit a copy of a Well Completion Report for the dug well that meets the requirements of We 801, *Well Completion Report*; and
  - d.) **Within 60 days** of receiving Interim Emergency Approval for the dug well, submit a new well siting application for the dug well that meets the requirements of Env-Ws 378. If a new well siting application is not submitted, the dug well must be disconnected from the water system **60 days** after obtaining the Interim Emergency Approval.

**Letter of Deficiency #WSEB 06-078**

Barton Mobile Home Park

Page 3 of 3

In the event compliance is not achieved within this time period, DES may take further enforcement action, including issuing an order requiring the deficiencies to be corrected, initiating an administrative fine proceeding, and/or referring the matter to the NH Department of Justice for imposition of appropriate penalties.

The documents and submittals requested above should be addressed as follows:

Diana Morgan, P.G.  
Department of Environmental Services  
Water Supply Engineering Bureau  
29 Hazen Drive, PO Box 95  
Concord, NH 03302-0095

If you have any questions concerning this letter, please contact Diana Morgan at (603) 271-2947, or by e-mail at [dmorgan@des.state.nh.us](mailto:dmorgan@des.state.nh.us).

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'COPY' with a large loop at the end.

Sarah Pillsbury, P.G., Administrator  
Water Supply Engineering Bureau

h:\wseb\enfmon\enforce\lods\well approval\2006\0702010 lod 06-078.doc

cc: Gretchen R. Hamel, DES Legal Unit Administrator  
Brandon Kernen, DES  
Diana Morgan, DES  
Allen Brooks, AGO  
Alec Bottomly, Primary Operator  
Vytautas Kasinskas, East Kingston Health Officer  
EPA, Region 1